

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Jane Roe, as Mother and Custodian
of Johnny Roe, et al.

Plaintiffs,

vs.

Butler County, Ohio et al.,

Defendants.

Case No. 1:01-CV-422

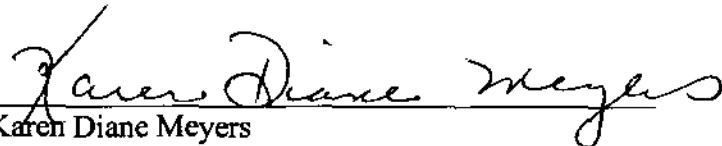
Judge Beckwith

**DECLARATION OF KAREN
MEYERS IN SUPPORT OF MOTION
TO AMEND**

I, Karen Diane Meyers, MBA, MEd, JD, CPCU, CLU, FLMI, CSSC declare
under the penalty of perjury under the United States of America that the foregoing is true
and correct and is based on my own personal knowledge.

1. I am the Executive Vice President of Little, Meyers, Garretson, & Associates, Ltd., located at 2651 Observatory Avenue, Cincinnati, Ohio and am Adjunct Professor at Miami University in Oxford Ohio in the Department of Finance and at Thomas More College in the Department of Business. I have extensive education supporting the subject matter of this affidavit. (See attached Exhibit A).
2. I am a co-developer and an annual faculty member in the Structured Settlement Consultant Certification Training Program at the Notre Dame University in South Bend Indiana.
3. I have been qualified both in State and Federal Courts as an expert for the sake of trial testimony as to the appropriateness and present value of annuities and future stream of payments based on my graduate education, experience, and insurance designations.
4. I am a licensed attorney and a licensed life and property casualty agent insurance agent in the State of Ohio.
5. I am not affiliated with or employed by any parties settling this matter, including, but not limited to the insurer paying the premium in this case.

6. I have reviewed the facts of this case and determined that a structured settlement annuity is in the best interest of the involved minor. It is my opinion that a structured settlement annuity placed in a highly rated life insurance company protects the minor from significant dissipation risks that a guardianship account would not, such risks including but limited to sudden wealth syndrome, matrimonial risk, and lending and spending risks all of which are documented in experience reports and by several research projects of which I am intimately familiar.
7. I am familiar with the practices of Plaintiff Counsel in this matter. I was involved in discussions regarding the appropriateness of settlement of this case with a structured settlement and know that a structured settlement was contemplated as part of the settlement of this case.


Karen Diane Meyers

Date: 1-6-2004

SHORT FORM CURRICULUM VITAE WITH PUBLICATIONS
Karen Diane Meyers BA, MBA/JD, MEd, CPCU, CLU, FLMI, CSSC

EXHIBIT A

Karen D. Meyers (Mrs.) Collegiate Environment (Dr. Karen)
 2651 Observatory Avenue
 Cincinnati, Ohio 45208
 Phone (513) 871-8900 Fax (513) 871-9099 Alternate Phone (513-777-100

Education

1968 Seton High School Cincinnati, Ohio
 1971 Thomas More College – BA (Summa Cum Laude)
 1978 Salmon P. Chase College of Law – Juris Doctorate
 1978 Xavier University-Masters in Business Administration
 1978 Xavier University-Masters in Education
 1981 Chartered Life Underwriter
 1984 Fellowship Life Management Institute
 1987 Chartered Property Casualty Underwriter
 1990 Xavier University-Post graduate work in Hospital Administration
 1994 University of Notre Dame-Chartered Structured Settlement Consultant (Co-Developer and Curriculum Designer)

Work History

1966 – 1978 Baldwin; Cincinnati, Ohio-Various Positions from File Clerk to Commercial Law Manager
 1971 – 1972 St. Teresa Grade School, Teacher
 1978 – 1991 Ohio Casualty Insurance Group/Ohio Life Insurance Company-Various Positions from Staff Attorney to Assistant Vice President – Special Markets/Senior Counsel; Liaison Shared Services, Co-Chair Life Investment Committee-to Counsel for Life Company.
 1978 – Now Adjunct Professor Business Administration-Thomas More College
 (Have taught fourteen different courses and designed four)
 1987 – Now Instructor CPCU 6-Business and Insurance Law
 1991 – Now Independent Contractor Presenter
 1991 – 1996 Benefit Designs, Inc. – Vice President Product and Market Development; Vice President-Client Services; Executive Vice President
 1996 – Now Little, Meyers, Garretson and Associates., Ltd.
 1998 – Now Miami University, Oxford, Ohio – Adjunct Professor Department of Finance (Dr. Karen D. Meyers)

Volunteer Work (Brief Listing)

Red Cross Volunteer, 1966 – Present: Red Cross Board 1980 – 86, '92 – '94: CCD Instructor 1964 – 1978: YWCA Board Member 1980 – 86: Thomas More College Board of Trustees 1992 – 94: Thomas More Alumni Board 1984 – Present: Chair and Developer – NSSTA National Certification 1994 – now: Thomas More Co-op Board 1996 – now: Thomas More Mentor 1982 – 94: Hamilton Chamber of Commerce 1986 – 91: Sur Optimistic Scholarship Judge 1995 – 98: Regional Moot Court Judge 1995 – now: CPCU Education Committee: Ohio Insurance Institute Speaker/Educator: Big Brother Big Sister Bowling fund Raiser 1996 – 97: NSSTA Annual Meeting Presentation Coordinator 1996 – 2001.

Awards (Brief Listing)

Over 40 Who's Who Publications; Summa Cum Laude Thomas More College; Outstanding Freshman; Outstanding Senior; 1990 Woman of the Year-Individual Progress Award; Ohio Institute Discussion Leader Award; Teacher of the Year-Thomas More College 1989; Alumni of the Year-Thomas More College 1988; Book Award; Evidence; Poverty Law; Commercial Transactions; Outstanding Service Award-Thomas More College 1971 and 1996; Red Cross Volunteer Award 1989, 2000; Outstanding Business Woman Award 1989-Hamilton; Outstanding Service Award; Lamar International Key Note Address 1996; Rose Award 1988-For Course Design; Pro Bono Lawyer Award 2000-2001.

Publications

Published the Preface to Profiles in 1994 and 1995 for the National Underwriter for Life, Health and Property Casualty Insurance; Ohio Life Lines (124 Issues) 1982-91 published by The Ohio Casualty Insurance Companies; Why Universal Life Won't Work, November 1986, Northwestern Life Newsletter; Structured Settlement CSSC Manual Prologue, Special Needs Trust, Medicaid and Medicare, published by NSSTA 1994 through 2001; Ghost

Writer updates, Periodic Payments, Law Journal Press – summers 1992 through 1996; The Pricing Of Annuities; LOMA ICAPS Annual Meeting, 1986; Needs Based Settlement of Catastrophic Injury Cases Winter 2000.

Presentations, Publications and Affiliations (Brief Listing)

Has made over 500 presentations; including several Utilizing Structured Settlements in the Settlement of Catastrophic Injury Claims; Strategic and Tactical Planning; Insurance and related Legal Topics; The Importance of Insurance; Annuities and Managed Care Affiliated with American, Ohio, Kentucky and Cincinnati Bar Associations and CPCU Society.

Collegiate and Graduate Courses Taught:

Law and Ethics Symposium
Law and Ethics Capstone
Business Law
Insurance Law
Diversity Law and Management Challenges
Benefits
Bridging the Communication Gap
Mediation and Conflict Management
Statistics
Quantitative Analysis
Research I
Organization and Behavior
Management and Organization
Principles of Supervision
Accounting 1
Certified Structured Settlement Program
 Tax Components
 Government Benefit Overview
 Product Components
 Claims Handling
 Claims Components
 Ethical Integration in the Marketplace